

# **Advisory Opinion 16-02-LOB, GCI**

Presented by:  
Heather Dalberg  
Paralegal I

**[03]**

## **ADVISORY OPINION REQUEST**

**Number:** AO 16-02-LOB  
**Requested By:** Timothy A. McKeever  
**Prepared By:** Heather L. Dalberg, Paralegal I, Juneau APOC Office  
**Date Issued:** March 14, 2016  
**Subject:** Reporting Requirements Regarding Lobbying Activity, In-Support of Lobbying Activity, and Outsourced Expenses by GCI

### **QUESTIONS PRESENTED**

1. Should GCI report employee lobbying activity if they are doing so during non-business hours?
2. Should GCI report time spent in direct communication with public officials if the meeting does not influence legislative or administrative action, but rather to educate on the matters at hand?
3. Can GCI report only the costs spent in the efforts to influence legislative or administrative action in a situation where both influencing and educating took place?
4. Does the presence of a public official or multiple public officials in a large group presentation count as “direct communication”?
5. GCI does not know the final cost of their aircraft use until the end of 2016. How should they determine the amount spent related to lobbying?
6. How should GCI report the lobbying activity costs of an executive when their compensation is determined by a variety of factors as opposed to a straightforward hourly rate?

### **SHORT ANSWER**

1. If the employees are receiving compensation, GCI should report all time spent lobbying and in-support of lobbying regardless of business hours.
2. Time spent in a meeting to educate with public officials or legislators present is reportable time.
3. GCI should report the costs spent on lobbying activity, which includes direct communication with the purpose to influence legislative or administrative action. If a meeting includes a small amount of time influencing legislative or administrative action, GCI only needs to report that small amount of time.

4. The presence of a public official in a large group does count toward the definition of “direct communication” as this would be considered communicating “in person”.
5. Estimate the cost for the year, multiply that number to get an hourly rate, and use that rate to report. If GCI finds that they were not correct in their estimation of the annual cost, they may amend their reports once they receive the correct number.
6. Break down the executive’s salary into an hourly rate and report based on that number.

## **FACTS**

- GCI is an employer of lobbyist that has assisted with the formation of the non-profit corporation Alaska’s Future, Inc.
- Alaska’s Future, Inc. is coordinating a public education campaign about the current fiscal gap.
- Employees of GCI are involved in the public education campaigns of Alaska’s Future, Inc. by way of lobbying activity and in-support of lobbying activity.
- In addition to lobbying activity and in-support of lobbying activity, employees of GCI are meeting with members of the public to educate them on the fiscal gap issue.
- GCI has provided travel for their employees for the aforementioned purposes.
- GCI is unsure of the final cost of their aircraft and would like to estimate the cost based on final total in 2015 as a reference point. With this estimate, they plan to develop an hourly cost and base their filings on that rate.
- GCI has executives who will be engaging in lobbying activity. Their salaries are not set at an hourly rate like GCI’s other employees. As such, they would like to take the executives’ year-end salary and divide the number by the hours they work in a given year to determine an hourly rate. GCI would like to use this number for their reports.

## **ANALYSIS**

1. GCI will have their employees engage in lobbying activity as part of their job duties. Lobbying activity includes communication “with any public official for the purpose of influencing legislation or administrative action”.<sup>1</sup> As an employer of lobbyist, GCI must report the direct costs for each employee doing lobbying activity on the Schedule B In-House portion of the quarterly reports.<sup>2</sup>

GCI has inquired if these costs need to be reported if the employees are lobbying outside of GCI’s business hours. Regardless of business hours, if the employees are compensated for their lobbying activity, it must be reported. As long as they are being compensated for the time they are lobbying, it does not matter if they are lobbying during business hours or after business hours. APOC requires

---

<sup>1</sup> AS 24.45.171(11)(A)

<sup>2</sup> AS 24.45.061(b)(3)

employer of lobbyists report “the total amount of payments made to influence legislative or administrative action during the period” per AS 24.45.061(b)(3). APOC recognizes the “total amount” as all the compensation paid to an employer of lobbyist’s employees, and not only those paid during business hours.

GCI employees ultimately need to keep track of the time they spend in direct communication with legislators, legislative employees, and public officials for the records of their employer. If they limit their time to less than 10 hours in a rolling 30-day period, these hours need to be reported by the employer. However, if they go over 10 hours in a rolling 30-day period directly communicating for the purpose of influencing legislative or administrative action, they must, in accordance with AS 24.45.171(11)(A), AS 24.45.041(b)(3), and 2 AAC 50.550(c), register as a lobbyist for their employer. The employee has seven days after exceeding the 10 hours to register with APOC.<sup>3</sup>

2. GCI plans to have its employees conduct educational campaigns in which public officials may be present. Lobbying activity includes direct communication with a legislator, legislative employee, or public official for the purpose of influencing legislative or administrative action. If public officials are present at the educational campaigns, this would be considered direct communication with those public officials.

Influencing legislative or administrative action is defined as communicating “directly for the purpose of introducing, promoting, advocating, supporting, modifying, opposing or delaying, or seeking to do the same with respect to any legislative or administrative action”.<sup>4</sup> In the matter presented the educational campaign is directed to have some action taken regarding the existing law—even if the precise change is not specifically spelled out. As a result any efforts of this type with a public official or legislator present would be reportable activity. GCI will need to keep track of the time their employees spent influencing legislative or administrative action and report the cost of that time.<sup>5</sup>

3. GCI would like to allocate the costs of their events where both education and lobbying efforts take place. As noted above, any meeting with a public official, legislator, or legislative employee present would be reportable time. GCI may hold an event where multiple actions occur. AS 24.45.061(b)(3) states that an employer of lobbyist must report “the total amount of payments made to influence legislative or administrative action during the period”. When regarding lobbying activity of employees, “payments made to influence legislative or administrative action” means “a payment, including compensation, payment, or reimbursement for the services, time, or expenses of an employee for or in connection with direct communication with a public official”.<sup>6</sup> Time and cost spent performing other job duties is not reportable. However, since the events where public officials and legislators are present is

---

<sup>3</sup> 2 AAC 50.550(c)

<sup>4</sup> AS 24.45.171(9)

<sup>5</sup> 2 AAC 50.575(b)(1)

<sup>6</sup> AS 24.45.171(13)(D)

considered influencing legislative and administrative action, the costs of employees' time spent conducting educational campaigns need to be reported. Only the time spent influencing legislative action, or lobbying, would be reportable. GCI need only report the compensation of lobbying activity paid to its employees. GCI may allocate their costs to reflect the time an employee has spent lobbying when other job duties that do not influence legislative or administrative action occurred at the same event.

4. GCI plans to conduct educational campaigns and events where lobbying may occur where public officials may be present in the audience; though there may be only one public official present among many Alaskan citizens. "Direct communication" is defined as "speaking with a legislator, legislative employee, or public official by telephone; by two-way electronic communication; or in person".<sup>7</sup> In the event of a meeting with a large number of attendees and only one public official or a few public officials, the time an employee spends influencing legislative or administrative action to the group would be considered "direct communication" as there are public officials present. This falls under the definition of "communicating directly" because it is "in person". If a public official or multiple public officials are present among a large crowd, this is still considered "direct communication" and needs to be reported.

5. GCI contracts aircrafts for employee travel. They receive their billing at the end of the year. In the event of travel where an employee's travel expenses are paid for by the employer of a lobbyist, the cost of travel must be reported on the quarterly reports under Schedule B in the "Outsourced" section.<sup>8</sup> GCI will not know the cost of the air travel until the end of the year, while they are required to report quarterly before they will have that final total. When the cost is unknown at the time of reporting, an employer may estimate the cost based on the previous year's totals. GCI may use the final cost of their aircraft contract from 2015 to estimate the final cost of 2016. However, when they receive their bill for the travel from the vendor, they must amend the report to reflect the exact cost if the estimated cost is not correct.

6. GCI's salaried employees (executives) will be engaging in lobbying activity and in-support of lobbying activity. Any employee who engages in lobbying activity for less than 10 hours in any rolling 30-day period or engages in-support of lobbying for more than 10 hours in any given month must be reported on the employer of lobbyist's report in the Schedule B section, per AS 24.45.061(b)(3) and 2 AAC 50.575(b)(2)(A) respectively. GCI has both hourly employees and salaried employees. Since GCI does not know the exact hourly wage of the executives, GCI should divide the year-end salary by the total hours worked for the year. GCI should use this hourly rate for their quarterly reports. If the year-end salary is not available, GCI should use the year-end salary from 2015 and amend their reports if necessary when they have the 2016 numbers available.

---

<sup>7</sup> AS 24.45.171(4)(A)(B)(C)

<sup>8</sup> 2 AAC 50.575(b)(2)(B)

## **CONCLUSION**

1. Business hours are not a factor when reporting lobbying activity of employees if the employees are being compensated. All time spent lobbying on behalf of the employer of lobbyist by its employees should be reported.
2. Time spent influencing legislative and administrative action is reportable for lobbying activity of the employer of lobbyist's employees. Educational campaigns, even those including multiple viewpoints, are considered to be influencing legislative or administrative actions when public officials or legislators are present.
3. Job duties outside of lobbying activity of the employer of lobbyist's employees are not reportable.
4. If a public official is present in a large group and the presenter is influencing legislative or administrative action, this is considered direct communication and is reportable.
5. Travel expenses must be reported and may be estimated if the final total is not available when the report is due. An amendment will be necessary if the estimated total is not correct when the employer of lobbyist knows the final total.
6. An employee's compensation for time spent lobbying and in-support of lobbying must be reported and may be determined based on the year-end salary of the employee divided by the hours the employee works in the given year. An amendment will be necessary if the estimated year-end numbers are not correct when the employer of lobbyist knows the final numbers

## **COMMISSION DECISION**

Only the Commission has the authority to approve an advisory opinion. 2 AAC 50.905. The Commission will rule on staff's proposed advice at its next regular meeting. The Commission may approve, disapprove, or modify the proposed advice. An advisory opinion must be approved by an affirmative vote of at least four members or it will be considered disapproved. Both staff's proposed advice and the Commission's final advisory opinion apply only to the specific facts and activity for which advice was requested.

If you rely on staff's proposed advisory opinion in good faith and the Commission subsequently rejects the proposed advice, staff will take no enforcement action on your activities up to that point if you acted under the specific facts described. If you have any additional questions or would like to discuss this proposed advice, please contact me at (907) 465-4864.

## **LAW**

### **Sec. 24.45.041. Registration; disqualification.**

(b) The registration form prescribed by the commission must include

(3) whether the person from whom the lobbyist receives compensation employs the person solely as a lobbyist or whether the person is a regular employee performing other services for the employer that include but are not limited to the influencing of legislative or administrative action;

### **Sec. 24.45.061. Reports by employers of lobbyists.**

(b) A person who employs, retains, or who contracts for the services of one or more lobbyists, whether independently or jointly with other persons, and who directly or indirectly makes payments to influence legislative or administrative action shall file a quarterly report containing

(3) the total amount of payments made to influence legislative or administrative action during the period, and the name and address of each person to whom these payments have been made during the period by the maker of the report, together with the date and amount;

### **AS 24.45.171 Definitions**

(4) "communicate directly" means to speak with a legislator, legislative employee, or public official

(A) by telephone;

(B) by two-way electronic communication; or

(C) in person;

\*\*\*

(9) "influencing legislative or administrative action" means to communicate directly for the purpose of introducing, promoting, advocating, supporting, modifying, opposing, or delaying or seeking to do the same with respect to any legislative or administrative action;

\*\*\*

(11) "lobbyist" means a person who

(A) is employed and receives payments, or who contracts for economic consideration, including reimbursement for reasonable travel and living expenses, to communicate directly or through the person's agents with any public official for the purpose of influencing legislation or administrative action for more than 10 hours in any 30-day period in one calendar year; or

\*\*\*

(13) "payment to influence legislative or administrative action" means any of the following:

(D) a payment, including compensation, payment, or reimbursement for the services, time, or expenses of an employee for or in connection with direct communication with a public official;

## **2 AAC 50.550. Registration by lobbyist**

(c) An individual who does not purport to be in the business, occupation, or profession of lobbying, but is employed, is retained, or contracts to engage in lobbying for compensation, including reimbursement for travel expenses and personal living expenses, shall submit the registration statement no later than seven days after that individual's lobbying activity exceeds 10 hours in any 30-day period in one calendar year. A person required to register under this subsection shall include all lobbying activity including the initial 10 hours before registration in the first reporting period. In this subsection, "lobbying activity" has the meaning given in 2 AAC 50.590, except that "lobbying activity" does not include research, or the drafting, preparation, or adaptation of documents for that individual's own use.

## **2 AAC 50.575 Reporting by employer of lobbyist**

(b) Each report of an employer of a lobbyist must include all information required under AS 24.45.061. In AS 24.45.061(b)(3), "the total amount of payments made to influence legislative or administrative action during the period" includes:

(1) the gross wages paid or payable for lobbying, prorated for the reporting period, plus any benefits such as stock options, annuities, or bonuses that are paid in place of or in addition to wages; wages and benefits required to be reported under this section do not include routine employment benefits that the employer pays on behalf of all employees, such as the employer's contribution to a health insurance plan, a retirement plan, or payroll taxes;

(2) the direct costs and expenses incurred by the employer in research, and in the drafting, preparation, or adaptation of documents for use by the lobbyist for the purpose of influencing legislative or administrative action; the information required under this paragraph includes

(A) for each employee who expends more than 10 hours per month directly supporting the employer's lobbying goals

(i) the name and business address of the employee;

(ii) a specific description of the subject of the work; and

(iii) the total amount paid based on the employee's gross compensation prorated for the employee's time spent in support of lobbying activity in the reporting period; the employer is not required to report general overhead expenses; and

(B) for a vendor, contractor, or other non-employee that provides services in support of lobbying activity, the name and address of the vendor, contractor, or other non-employee, a specific description of the subject of the work, and the date and amount of any payment in the reporting period;



LAW OFFICES OF  
**HOLMES WEDDLE & BARCOTT**

A PROFESSIONAL CORPORATION

Founded 1914

OVER A CENTURY OF SERVICE TO OUR CLIENTS

WELLS FARGO CENTER - 999 THIRD AVENUE, SUITE 2600 - SEATTLE, WASHINGTON 98104 4011  
TELEPHONE (206) 292-8008 - FAX (206) 340-0289

TIMOTHY A. McKEEVER

EMAIL: [tmckeever@hwb-law.com](mailto:tmckeever@hwb-law.com)

March 10, 2016

**Via Facsimile (907. 276.7018) and US Postal Service**

Paul Dauphinais  
Executive Director  
Alaska Public Offices Commission  
2221 E. Northern Lights Blvd STE 128  
Anchorage, AK 99508-4149

**RE: Request for an Advisory Opinion  
Our File No.: 6289-28596**

Dear Mr. Dauphinais:

GCI Communication Corp. ("GCI"), respectfully requests an advisory opinion on the reporting obligations to the Alaska Public Offices Commission ("Commission") concerning certain activities as described below.

**Factual Background**

GCI is a telecommunications company with primary operations in Alaska. Like many companies, GCI employs lobbyists who advocate on its behalf with Alaska public officials concerning policy proposals that affect the company. These efforts allow public officials to have a better understanding of how issues directly affect GCI's business, as well as the constituents of those public officials, many of whom are GCI customers. This role is particularly important in the telecommunications industry where government proposals can have multiple effects on GCI's complex services and federal regulation often overlaps with state regulatory efforts.

The Alaska economy directly affects GCI's business, and along with many customers and employees, the company has a keen interest in a strong local economy with a sustainable state government. In particular, GCI and large numbers of its employees are concerned about the fiscal gap currently facing Alaska due to the significant decline in state revenue, and the impact that fiscal gap will have on the future of Alaska. Accordingly, it has assisted with the formation and organization of Alaska's Future, Inc. an Alaska non-profit corporation that is coordinating a public education campaign about the current fiscal gap and encouraging Alaskans to directly communicate with public officials to express their support of using a combination of cuts, taxes, and earnings from the Permanent Fund to close the gap. GCI employee activities include

**ARRIVED**

3-10-2016

**APOC - ANCH  
PM HC FAX ELE**

Mr. Paul Dauphinais

March 10, 2016

Page 2

assisting Alaska's Future in coordinating speaking engagements, making speeches in support of the group, and serving as an officer of the organization.

In addition, individual GCI employees and executives have met with other concerned Alaskans to discuss the fiscal gap, to educate and inform them about the fiscal gap, and to encourage public officials to support using a portion of the earnings of the Alaska Permanent Fund in combination with spending cuts and other new revenue sources to help overcome the current revenue shortfall. Some of these meetings have involved traveling to various locations using aircraft leased to or owned by GCI or commercial flights in connection with the above activities. Various GCI employees have also been invited to meet with public officials concerning the fiscal gap.

Because GCI employs lobbyists, it understands that consistent with AS 24.45.061(b), it must report not only the amounts it pays to its lobbyists, but also the amounts it spends with outside vendors in support of the fiscal gap lobbying effort, and the cost of internal resources, i.e., the value of employee time and the value of aircraft and other equipment or company resources used to support Alaska's Future. In connection with the above activities, however, a number of questions have arisen regarding how to account for the value of these services, employee time, and similar issues. Accordingly, GCI respectfully requests the Commission's response to the following questions.

### Questions

- 1) If GCI employees engage in direct communication with public officials, encourage others to directly communicate with public officials, or engage in activities in support of such lobbying activities concerning the fiscal gap during non-business hours, must GCI report the cost of the time spent by those employees?
- 2) Meeting with public officials and with others involves a significant amount of education and information concerning the nature, extent of, and cause of the fiscal gap and does not always involve seeking changes to existing law. If during such meetings, the discussion only involves education and sharing such information and there is no discussion of influencing legislative or administrative action as defined in AS 24.45.171(9), must GCI report any costs associated with such meetings to the Commission?
- 3) Meeting with public officials or with members of the public may involve both education and information about the state revenue situation and, in the case of discussions with public officials direct communication seeking to influence legislative or administrative action or, in the case of members of the public, encouraging others to engage in direct communication with public officials. In determining the amount to be reported to the Commission, can GCI allocate the costs it may incur between the information/education portion of such meetings and the advocacy/lobbying portion of the meetings?
- 4) GCI has held group meetings of varying sizes, often with 20 or more individuals, during which various GCI employees have educated and informed attendees about the fiscal gap

Mr. Paul Dauphinais

March 10, 2016

Page 3

and encouraged them to communicate with public officials about potential solutions. From time-to-time, one or more public officials may attend such meetings even if not specifically invited. Does the presence of public officials, as defined in AS 24.25.171(15), in such large meetings render the presentation a "direct communication" and require GCI to report it as such pursuant to its APOC reporting obligations? If reporting is required under this scenario, is the entirety of the meeting reportable, or in pertinent part, measured in proportion to the segment dedicated to the encouragement to communicate with public officials?

5) In some instances, GCI has traveled to meetings related to the Alaska's Future campaign using GCI-owned or -leased aircraft. GCI is determining the cost of that travel based on a calculation of the overall cost of the use of aircraft in the prior calendar year and projecting that cost forward for 2016, per its normal business operating budget practice, since the full cost for 2016 will not be available until the end of 2016. GCI intends to determine this cost by adding the (i) lease payments or, in the case of company-owned aircraft, the amortized cost of the aircraft across the life of the asset and (ii) the cost of pilot salaries, insurance, hanger fees, fuel, maintenance, and inspection costs. The hourly cost of the aircraft would be determined by dividing this annual cost by the number of hours the aircraft was used in the prior year. The cost of any specific lobbying-related trip would be calculated by using that hourly rate to determine the cost of the flight time for lobbying-related activities during a trip. In order to assure that GCI is properly complying with its reporting obligations, it requests confirmation that this is an appropriate method of valuing the cost of use of such aircraft.

6) Some of the GCI employees supporting the Alaska's Future campaign are executives whose compensation can be a complex mix of variables that include, for example, vested or unvested stock grants, restricted stock, and bonuses based on a combination of cash and stock benchmarked against the company's performance, which performance cannot be determined until year end. GCI proposes to determine the gross compensations of such executives pursuant to 2 AAC 50.575 (b)(2)(A)(iii), according to the value reported to the Securities and Exchange Commission for 2015<sup>1</sup> and to divide that number by 3000, i.e., the approximate number of hours they work in a given year in order to come up with an hourly rate.<sup>2</sup> The total reported value to APOC would then be this hourly rate multiplied by the number of hours spent lobbying or in support of lobbying efforts. GCI would like to confirm that this method is an appropriate way of determining the amount to report to APOC.

GCI requests a formal advisory opinion from the Commission on the above issues. The activities described in this request are on-going and GCI wishes to fully comply with any reporting obligations it may have. Responses to the above questions will permit GCI's full compliance with those reporting obligations. A separate but related request for an advisory

---

<sup>1</sup> GCI reports the compensation of its senior executives in its Summary Compensation Table within its annual 10-K filed with the SEC.

<sup>2</sup> As GCI executives with substantial responsibility for the company, these individuals are expected to be available at all hours, work many nights, weekends, and other odd hours, and to generally work far in excess of a more normal 40-hour week. Accordingly, GCI multiplied a typical 60-hour work week by 50 weeks in a year, which accounts for 2 weeks of vacation, to come up with a total of 3000 hours.

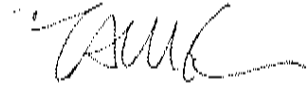
Mr. Paul Dauphinais

March 10, 2016

Page 4

opinion is being prepared by Alaska's Future, and the Commission may wish to consider both requests in tandem. If the staff has questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'TAMC', with a long horizontal flourish extending to the right.

Timothy A. McKeever

G:\6289\28596\Correspondence\2016-03-10\tr TAM to Dauphinais.docx

LAW OFFICES OF  
**HOLMES WEDDLE & BARCOTT**  
A PROFESSIONAL CORPORATION

999 Third Avenue, Suite 2600, Seattle, WA 98104-4011

Phone: 206-292-8008 Fax: 206-340-0289

**FAX COVER SHEET**

FAX NUMBER TRANSMITTED TO: 907-276-7018

To: Paul Dauphinais, Executive Director  
Of: Alaska Public Offices Commission  
From: Lindsey Martin  
Legal Assistant to Timothy McKeever  
Client/Matter: 6289-28596 (GCI Communication Corp.)  
Date: March 10, 2016

DOCUMENTS	NUMBER OF PAGES*
March 10, 2016 Letter re GCI Advisory Opinion	4
<b>TOTAL PAGES (including cover)</b>	<b>5</b>

COMMENTS:

A hard copy will follow in the mail.

Please contact us with any questions.

If you have any problems in receipt of this facsimile, please call (206) 292-8008.

Document2

APOC 3-10-2016

CONFIDENTIALITY NOTICE: The documents accompanying this facsimile message contain confidential communications which may be subject to protection under the attorney-client privilege or the attorney work-product doctrine. These documents are intended solely for the use of the proper addressee and should not be read or retained by anyone other than the intended recipient. If you have received this facsimile in error, please notify us immediately by collect telephone call at (206) 292-8008.



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222  
240 Main Street, Room 500  
Juneau, Alaska 99811-0222  
Main: 907.465.4864  
Toll Free in Alaska: 866.465.4864  
Email: [doa.apocjnu@alaska.gov](mailto:doa.apocjnu@alaska.gov)  
[www.doa.alaska.gov/apoc](http://www.doa.alaska.gov/apoc)

March 18, 2016

VIA U.S. MAIL and EMAIL

Timothy A. McKeever  
999 Third Avenue, Suite 2600  
Seattle, WA 998104-4011  
[tmckeever@hwb-law.com](mailto:tmckeever@hwb-law.com)

Re: Advisory Opinion Request AO 16-02-LOB

Dear Mr. McKeever:

Please find the attached advisory opinion regarding your March 10, 2016 request for guidance related to GCI's reporting requirements associated with lobbying activity and in-support of lobbying activity of their employees and the estimation of costs regarding the aforementioned and outsourced expenses.

The conclusion of this opinion has not yet been submitted for approval by the Alaska Public Offices Commission. AS 15.13.374. Only the Commission has the authority to approve an advisory opinion under 2AAC 50.840. The Commission will rule on staff's proposed advice at its next regular meeting.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather L. Dalberg".

Heather L. Dalberg  
Paralegal I

CC: Paul Dauphinais, Executive Director  
APOC Commission Members  
Thomas Dosik, Assistant Attorney General  
Senior Staff

Encl: Unapproved Advisory Opinion AO



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128  
Anchorage, AK 99508-4149  
Main: 907.276.4176  
Fax: 907.276.7018  
[www.doa.alaska.gov/apoc](http://www.doa.alaska.gov/apoc)

May 19, 2016

VIA EMAIL & CERTIFIED MAIL

Timothy McKeever  
701 West Eighth Ave, Suite 700  
301 W Northern Lights Blvd #601  
Anchorage, AK 99501-3408  
[tmckeever@hwb-law.com](mailto:tmckeever@hwb-law.com)

RE: COMMISSION MEETING NOTICE

Dear Mr. McKeever:

At its June 8, 2016 Commission Meeting in Anchorage, the Commission will review the matter of your advisory opinion request.

You have the right to participate at the meeting either in person or by telephone (1-800-315-6338, code 4176 #1). If you decide to participate please let APOC staff know that you will be doing so and whether your participation will be in person or via telephone. The Commission is expected to review your Advisory Opinion (AO 16-02-LOB) at approximately 9:30 AM on June 8, 2016.

If you have any questions please feel free to call APOC staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather L. Dalberg".

Heather L. Dalberg  
Paralegal I

7010 2780 0000 7493 4394

U.S. Postal Service<sup>TM</sup>  
**CERTIFIED MAIL<sup>TM</sup> RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark  
Here

Sent To *Tim McKeever*

*June Meeting Notice*

Street, Apt. No.,  
or PO Box No.

City, State, ZIP+4

PS Form 3800, August 2005

See Reverse for Instructions